

# **Exhibit A**

**From:** [Daniel Garza](#)  
**To:** [Fox, David M.](#); [Fred Williams](#); [Livingston, Adam](#); [Todd Landis](#); [Michael Simons](#); [John Wittenzellner](#); [GTP Counsel WSL](#)  
**Cc:** [Team Samsung GTP](#); [Melissa Smith](#); [Bryan Clark](#); [Kent E. Baldauf Jr.](#); [Phyllis M. Taranto](#); [Mark Mann](#); [Blake Thompson](#); [Matt Warren](#); [Warren Lex Project Buckeye](#)  
**Subject:** [EXT] RE: Gesture Technology Partners, LLC v. Huawei Device Co., Ltd. et al., 2:21-cv-0040-JRG -- Supplementing Contentions  
**Date:** Friday, September 17, 2021 3:21:39 PM  
**Attachments:** [image003.png](#)

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Counsel,

GTP is opposed.

**Daniel Garza**  
**Williams Simons & Landis PLLC**  
327 Congress Avenue, Suite 490  
Austin, Texas 78701  
Direct: 512-813-9693  
Cell: 830-765-4069



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**From:** Fox, David M. <davidfox@paulhastings.com>  
**Sent:** Friday, September 17, 2021 3:54 PM  
**To:** Fred Williams <fwilliams@wsltrial.com>; Livingston, Adam <alivingston@wsltrial.com>; Todd Landis <tlandis@wsltrial.com>; Michael Simons <msimons@wsltrial.com>; John Wittenzellner <johnw@wsltrial.com>; GTP Counsel WSL <gtpcounselwsl@wsltrial.com>; Daniel Garza <dgarza@wsltrial.com>  
**Cc:** Team Samsung GTP <TeamSamsungGTP@paulhastings.com>; Melissa Smith <melissa@gillamsmithlaw.com>; Bryan Clark <bclark@webblaw.com>; Kent E. Baldauf Jr. <kbaldaufjr@webblaw.com>; Phyllis M. Taranto <PTaranto@webblaw.com>; Mark Mann <mark@themannfirm.com>; Blake Thompson <blake@themannfirm.com>; Matt Warren <matt@warrenlex.com>; Warren Lex Project Buckeye <buckeye@matters.warrenlex.com>  
**Subject:** RE: Gesture Technology Partners, LLC v. Huawei Device Co., Ltd. et al., 2:21-cv-0040-JRG -- Supplementing Contentions

Counsel,

I am writing once again to follow-up on the emails below. Please advise today whether GTP opposes Defendants' proposed supplementation. Defendants plan to file their motion today, as stated in our previous emails, and would like to do so unopposed. If we do not hear from you, however, we will count GTP as opposed.

Thank you,  
David

---

**From:** Fox, David M.  
**Sent:** Wednesday, September 15, 2021 12:17 PM  
**To:** 'fwilliams@wsltrial.com' <[fwilliams@wsltrial.com](mailto:fwilliams@wsltrial.com)>; 'alivingston@wsltrial.com' <[alivingston@wsltrial.com](mailto:alivingston@wsltrial.com)>; 'tlandis@wsltrial.com' <[tlandis@wsltrial.com](mailto:tlandis@wsltrial.com)>; 'msimons@wsltrial.com' <[msimons@wsltrial.com](mailto:msimons@wsltrial.com)>; 'johnw@wsltrial.com' <[johnw@wsltrial.com](mailto:johnw@wsltrial.com)>; 'gtpcounselwsl@wsltrial.com' <[gtpcounselwsl@wsltrial.com](mailto:gtpcounselwsl@wsltrial.com)>; 'Daniel Garza' <[dgarza@wsltrial.com](mailto:dgarza@wsltrial.com)>  
**Cc:** Team Samsung GTP <[TeamSamsungGTP@paulhastings.com](mailto:TeamSamsungGTP@paulhastings.com)>; 'Melissa Smith' <[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)>; 'Bryan Clark' <[bclark@webblaw.com](mailto:bclark@webblaw.com)>; 'Kent E. Baldauf Jr.' <[kbaldaufjr@webblaw.com](mailto:kbaldaufjr@webblaw.com)>; 'Phyllis M. Taranto' <[PTaranto@webblaw.com](mailto:PTaranto@webblaw.com)>; 'Mark Mann' <[mark@themannfirm.com](mailto:mark@themannfirm.com)>; 'Blake Thompson' <[blake@themannfirm.com](mailto:blake@themannfirm.com)>; 'Matt Warren' <[matt@warrenlex.com](mailto:matt@warrenlex.com)>; 'Warren Lex Project Buckeye' <[buckeye@matters.warrenlex.com](mailto:buckeye@matters.warrenlex.com)>  
**Subject:** RE: Gesture Technology Partners, LLC v. Huawei Device Co., Ltd. et al., 2:21-cv-0040-JRG -- Supplementing Contentions

Counsel,

I am writing to follow-up on the email below. Please advise whether GTP opposes Defendants' proposed supplementation. Defendants plan to file their motion on Friday, September 17, and hope to do so unopposed. If we do not hear from you, we will note as much in the motion.

Thank you,

David

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**From:** Fox, David M.

**Sent:** Friday, September 10, 2021 10:33 AM

**To:** [fwilliams@wsltrial.com](mailto:fwilliams@wsltrial.com); [alivingston@wsltrial.com](mailto:alivingston@wsltrial.com); [tlandis@wsltrial.com](mailto:tlandis@wsltrial.com); [msimons@wsltrial.com](mailto:msimons@wsltrial.com); [johnw@wsltrial.com](mailto:johnw@wsltrial.com); [gtpcounselwsl@wsltrial.com](mailto:gtpcounselwsl@wsltrial.com); Daniel Garza <[dgarza@wsltrial.com](mailto:dgarza@wsltrial.com)>

**Cc:** Team Samsung GTP <[TeamSamsungGTP@paulhastings.com](mailto:TeamSamsungGTP@paulhastings.com)>; 'Melissa Smith' <[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)>; 'Bryan Clark' <[bclark@webblaw.com](mailto:bclark@webblaw.com)>; 'Kent E. Baldauf Jr.' <[kbaldaufjr@webblaw.com](mailto:kbaldaufjr@webblaw.com)>; Phyllis M. Taranto <[PTaranto@webblaw.com](mailto:PTaranto@webblaw.com)>; 'Mark Mann' <[mark@themannfirm.com](mailto:mark@themannfirm.com)>; 'Blake Thompson' <[blake@themannfirm.com](mailto:blake@themannfirm.com)>; 'Matt Warren' <[matt@warrenlex.com](mailto:matt@warrenlex.com)>; 'Warren Lex Project Buckeye' <[buckeye@matters.warrenlex.com](mailto:buckeye@matters.warrenlex.com)>

**Subject:** Gesture Technology Partners, LLC v. Huawei Device Co., Ltd. et al., 2:21-cv-0040-JRG -- Supplementing Contentions

Counsel,

Defendants will seek the Court's leave to supplement their Invalidity & Subject-Matter Eligibility Contentions ("Contentions"), served July 6, 2021.

As you are aware, Defendants' Contentions disclosed, among others, two prior art systems: (1) TV Controller Using Hand Gestures and Related Interactive Computer Graphics Applications ("MERL"), and (2) 3D Image Control with Hand Gestures, including Control of Molecular Biology Modeling ("MDScope"). As you are also aware, Defendants subpoenaed documents from Mitsubishi Electric Research Laboratories, Inc. (creator of the MERL system) and the Beckman Institute, University of Illinois at Urbana-Champaign (creator of the MDScope system).

In response, Mitsubishi Labs produced a video, which we served on September 2, that provides additional background and support for the disclosed MERL system. In addition, the Beckman Institute produced the six publications, which we served on August 25, that provide additional background and support for the disclosed MDScope system. Although Defendants believe their Contentions served July 6 are entirely sufficient with respect to these prior art systems and do not require supplementation, out of an abundance of caution Defendants will seek leave to supplement their Contentions with this additional background and supporting evidence. For your reference, you will receive a link in a separate email to download the video clip and six publications.

Defendants' proposed supplementation to their Contentions will be included in the separate link for download, with changes shown in redline. Please let us know as soon as possible (but no later than Wednesday, September 15) whether GTP will oppose Defendants' motion for leave.

Thank you,  
David

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**PAUL  
HASTINGS**

**David M. Fox | Associate, Litigation Department**

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